

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD GREEN, ESQUIRE,	:	CIVIL ACTION NO.: 02-cv-4590
	:	
<i>Plaintiff,</i>	:	
	:	
vs.	:	
	:	
ZURICH AMERICAN INSURANCE	:	
COMPANY,	:	
	:	
<i>Defendant.</i>	:	

JURY INTERROGATORIES

Each of the following questions are to be resolved by unanimous vote of a jury.

I. AGE DISCRIMINATION

1. Do you find that Plaintiff proved by a preponderance of the evidence that Defendant unlawfully discriminated against him because of his age?

Yes _____ No _____

Instructions:

If the answer to the above question is “Yes,” go to the next question.

If you answered “No” to Question 1, you need not proceed any further, but should enter a verdict for defendant.

2. Do you find by a preponderance of the evidence that the Defendant willfully violated the Age Discrimination in Employment Act, as defined in the jury charge?

Yes _____ No _____

Instructions:

If the answer is “Yes,” proceed to next question.

3. Do you find that the defendant has articulated or advanced a legitimate business reason for its decision to terminate the Plaintiff?

Yes _____ No _____

Instructions:

If your answer to the above question is “No,” stop at this point and return a verdict for Plaintiff.

If your answer is “Yes,” proceed to the next question.

4. Do you find, by a preponderance of the evidence, that plaintiff has proved that defendant's legitimate business reason was a pretext for discrimination?

Yes _____ No _____

Instructions:

If your answer is "No," stop at this point and return a verdict for defendant.

If your answer is "yes," proceed to issue of damages.

II. DAMAGES

5. What amount of economic damages is Plaintiff entitled to recover from the Defendant to compensate him for his past lost wages through the present?

\$ _____

6. What amount of front pay is Plaintiff entitled to receive?

\$ _____

7. What amount of compensatory damages is the Plaintiff entitled to receive?

\$ _____

8. What amount if any do you award the Plaintiff as punitive damages?

\$ _____

This ____ day of _____, 2003

Respectfully submitted,

LOVITZ & GOLD, P.C.

BY: _____

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